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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NUMBER: 15-00161
	*	
	*	
VERSUS	*	
	*	JUDGE HICKS
RICHARD WILSON &	*	
RONALD WILSON	*	MAGISTRATE JUDGE HORNSBY

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Between on or about February 11, 2015, and March 9, 2015, in the Western District of Louisiana, the defendant, RICHARD WILSON, did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), that was mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(2)(A). [18 U.S.C. § 2252A(a)(2)(A)].

COUNT TWO

On or about March 18, 2015, in the Western District of Louisiana, the defendant, RICHARD WILSON, did knowingly possess material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), which involved a minor who had not reached the age of 12, that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B). [18 U.S.C. § 2252A(a)(5)(B)].

COUNT THREE

On or about March 18, 2015, in the Western District of Louisiana, the defendant, RONALD WILSON, did knowingly possess material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), which involved a minor who had not reached the age of 12, that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B). [18 U.S.C. § 2252A(a)(5)(B)].

CRIMINAL FORFEITURE

1. The allegations contained in COUNTS ONE, TWO, and THREE are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of the commission of the violations charged in COUNTS ONE, TWO, and THREE of the indictment, the defendants RICHARD WILSON and RONALD WILSON, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all of defendants' interest in:

a. Any visual depiction described in Title 18, United States Code, Section 2251, 2252 or 2252A of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110.

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, which includes, but not limited to:

1. Desk Top Computers
2. Lap Top Computers
3. Internal and External Harddrives
4. Digital Storage Media
5. Thumb Drives
6. VHS Cassettes
7. CDs and DVDs

3. If any of the property described above, as being subject to forfeiture, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property, which cannot be divided without difficulty, the United States of America may, pursuant to Title 18, United States Code, Section 2253(o), seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL

REDACTED
Grand Jury Foreperson

STEPHANIE A. FINLEY
United States Attorney

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